

**FEDERAL MARITIME COMMISSION**

**WASHINGTON, D.C.**

**DOCKET NO. 15-11**

**IGOR OVCHINNIKOV, ET AL**

**v.**

**MICHAEL HITRINOV, ET AL**

**Consolidated With**

**DOCKET NO. 1953(I)**

**KAIRAT NURGAZINOV, ET AL**

**v.**

**MICHAEL HITRINOV, ET AL**

**RESPONDENTS' MOTION FOR EXTENSION OF TIME**

Pursuant to FMC Rules 69 and 71, Respondents Empire United Lines and Michael Hitrinov hereby move for an extension until July 15, 2016 of any and all deadlines applicable to Respondents that are or may be due before that date, including but not limited to their Reply to Complainants' Response to Respondents' Motion for Judgment on the Pleadings. The reason for this request is that Counsel for Respondents will be out of the country from June 23 through July 5, 2016. This fact was noted in Respondents' Proposed Schedule, which if adopted would appear to alleviate the need for this motion.<sup>1</sup>

As noted above, the undersigned will be out of the country during the aforementioned dates. This trip was planned (and paid for) well before the undersigned became Counsel for

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<sup>1</sup> Complainants' Counsel has declined to consent to this motion.

Respondents. Although Ms. Vohra is extraordinarily capable for a first-year lawyer, her knowledge of the Shipping Act and her litigation experience is as yet quite limited. Thus, absent the requested extension, Respondents will effectively be without Counsel during the time period at issue.

The undersigned notes in candor that there is a complicating factor that may affect timing. Counsel's father is seriously ill in the hospital and is expected to be transferred soon to palliative care, so depending on developments it is possible that the trip will be canceled or cut short as matters develop. The undersigned will notify the Presiding Officer and Counsel for Complainants of any changes that affect the timing of the undersigned's availability.

The undersigned notes that, as provided for in the Proposed Schedule, Respondents have no objection, given the unavailability of Counsel for Respondents, to Complainants receiving (if requested) an extension of time in which to file their Response to Respondents' Motion for Judgment on the Pleadings.<sup>2</sup>

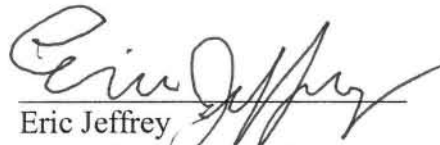
Finally, as it is impossible to forecast exactly what may be due after the undersigned's return, there may possibly be further requests for the extension of individual deadlines.

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<sup>2</sup> Such an extension is already provided for in Respondents' Proposed Schedule.

For the foregoing reasons, Respondents respectfully request that the foregoing motion for extension of time be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric Jeffrey", is written over a horizontal line.

Eric Jeffrey

**Nixon Peabody LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing Motion of Respondents for Extension of Time by email and first class mail to the following:

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Dated at Washington, DC, this 21<sup>st</sup> day of June, 2016.

  
Eric Jeffrey  
Counsel for Respondents